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January 26, 2023

Via ECF

Hon. Andrew M. Edison
United States Magistrate Judge
United States District Court
Southern District of Texas
601 Rosenberg, Seventh Floor
Galveston, TX 77550

Re: *Edwards v. McDermott Int'l, et al.*, No. 4:18-cv-4330;
Kingstown v. Dickson, et al., No. 4:20-cv-02880

Dear Judge Edison,

In accordance with this Court's December 23, 2022 Orders, and after conferring in good faith, the parties in the above-captioned actions respectfully submit herewith their proposals regarding an order to achieve case coordination and establish a deposition protocol.

- Exhibit A is the joint proposal of the §10(b) Lead Plaintiff, the §14(a) Lead Plaintiff, and the *Kingstown* plaintiffs;
- Exhibit B is the Defendants' proposal.

If the Court wishes to have a hearing, the parties respectfully request the opportunity to propose mutually workable dates for the Court's consideration. The parties otherwise will continue to confer.

Respectfully submitted,

/s/ Matthew Tuccillo

Lead Counsel for the § 10(b) Lead Plaintiff

/s/ Matthew Insley-Pruitt

Lead Counsel for the §14(a) Lead Plaintiff

Cc: Defense counsel
Kingstown plaintiffs' counsel